

EXHIBIT A

Proposed Form of Order

(Attached)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

FCS ADVISORS, LLC,

Plaintiff,

—against—

THEIA GROUP, INC., d/b/a “THORIAN
GROUP” and/or “CYPHERIAN”; THEIA
AVIATION, LLC; and THEIA HOLDINGS
A, INC., d/b/a “THORIAN HOLDINGS,”

Defendants.

21 Civ. 6995 (PKC)

**[PROPOSED] ORDER GRANTING EXPEDITED MOTION OF
RECEIVER FOR AN ORDER FURTHER EXTENDING
THE STAY PROVIDED IN THE RECEIVERSHIP ORDER**

Upon consideration of the (i) *Expedited Motion of Receiver for an Order Further Extending the Stay Provided in the Receivership Order* (the “Motion”), (ii) the accompanying *Memorandum of Law in Support of the Motion* (the “Memorandum”),¹ and (iii) the *Declaration of Michael Fuqua, as Receiver, in Support of the Motion* (the “Fuqua Declaration”); and this Court having found that the Receiver’s notice of the Motion and opportunity for a hearing on the Motion were appropriate and that no other notice need be provided; and this Court having reviewed the Motion, the Memorandum of Law, and the Fuqua Declaration; and this Court having determined that the legal and factual bases set forth in the Memorandum of Law establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and consideration, and good and sufficient cause appearing therefor;

¹ Capitalized terms not defined in this Order shall have the meaning given such terms in the Memorandum.

IT IS HEREBY ORDERED THAT:

1. The Motion is **GRANTED** as set forth herein;
2. The Receivership Stay provided for in paragraph 4 of the Receivership Order is further extended through and including January 31, 2023 without prejudice to (a) the Receiver's right to seek further extensions of the Receivership Stay or (b) the right of any party or non-party under paragraph 4 of the Receivership Order to seek relief from the Receivership Stay;
3. The extension of the Receivership Stay through and including January 31, 2023 is without prejudice to the rights of any creditor of the Receivership Entities with respect to the sale of any Receivership Assets; and
4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

Dated: December ____, 2022
New York, New York

P. KEVIN CASTEL
UNITED STATES DISTRICT JUDGE